

- determining/calculating said location-dependent timings for said location of said mobile device;
- and, announcing/notifying the said timings to the user of said mobile device at the specifically determined/calculated timings of said prayers.

10. The method as recited in claim 9, wherein said location-dependent timings are looked-up from a pre-calculated location-specific table.

11. The method as recited in claim 9, wherein said location-dependent timings are dynamically calculated from said mobile device's location parameters as known by said wireless telecommunication system.

#### REMARKS — General

By the above amendment, in essence, applicant has rewritten only claim 1, and claim 9, which are the two independent claims. Rest of the dependent claim, have been largely kept un-touched. The re-phrasing of claim 1 & claim 9, was considered necessary, in order to emphasize the novelty of the invention, so as to overcome the technical rejections and define the invention patentably over the prior art..

The rewritten claim 1, clearly distinguishes between the claimed invention's location determination technique and the methods employed by prior art. Due to this difference in the fundamental approach, the claimed invention's hand-held mobile device is also very different from hand-held devices of prior art. These distinct features are listed in the following table, as under:

<b>Hand-held devices of prior art:</b>	<b>The Claimed Invention's hand-held device:</b>
Requires location determination element, either through G.P.S. or similar receiver or through some calculation method.	Does not require any location determining element.  Cellular network system detects hand-held device's presence within a particular cell and then the system determines the location which is also the Cell ID.
Requires intelligent decision making algorithm.	Does not require any intelligent decision-making.  It is a dumb device which only follows orders. All decisions are made remotely by the software application.
Requires memory to store information, like event's details, location, timings etc.	Does not require memory to store information.  The only information it ever needs is related to its own identity which is transmitted to the local base station and thus the cellular system detects the presence of a particular subscriber in a particular cell. The identity comprise of three numbers known as ESN, SID, and MID. Electronic Serial Number ESN is embedded in the device while System Identity SID, and Mobile Identity MID are stored in the device at the time of activation without which the device can not be part of the cellular telecommunication system.
Specifically fashioned for the purposes of prior art.	Requires no modification in any existing cellular device or existing cellular infrastructure.

Although the applicant's invention, like the prior art, also pertains to "location based services" but the definition of "location" in prior art is very different than in the applicant's invention. This distinction is elaborated in the following table as under:

<b>Prior Art's Location</b>	<b>The Claimed Invention's Location</b>
Is specified by Longitude & Latitude	Is specified by Cell ID
Will always have a margin of error, and thus location can never be accurately specified	Cellular phone communicates to one and only one base-station at one given point in time, thus the Cell ID is specified accurately.
Is an small area within the radius of few meters.	May cover an area around 50 miles across
Even just outside the limited location area, the information or services like traffic info, etc. are normally considered useless.	Azan timings for an adjacent Cell ID will just give an error of less than a minute, and this margin of error will still be acceptable in most cases.

Due to above-mentioned differences in the hand-held devices of prior art and the applicant's hand-held device, and due to the difference in the concept of "location", the applicant's system can be easily distinguished from the systems of prior art. This is elaborated in the following table:

<b>Prior Art's system:</b>	<b>The Claimed Invention's system:</b>
Seeks highly localized information.	Seeks information which is thinly spread and evenly spaced.
Performs most jobs as stand-alone device.	Works in tandem with the cellular telecommunication network. With out the network signal, a cellular hand-held device is useless.
Will work anywhere on the planet. Longitude and latitude can be specified for all points on earth's surface. These parameters can be iput manually or automatically through GPS receivers as GPS sattelites system cover the whole earth.	Will work only in the cellular telecommunication network coverage area.

**Unique Concept of Azaan Zone :** Beside the above-mentioned differences from the prior art, the applicant has developed a unique concept of Azaan Zone which comprise of one or more of adjascent cellular zones. Look-up tables can be fine tuned to effeciently translate Cell-Id into the Azaan-zones. Location parameters

may originally be in a variety of format but for the purposes of claimed invention, these paramets will eventually be translated into Azaan Zones. Each Azaan-zone will have to be individually mapped so as to take care of terrain and topography. This will provide sufficient control for the purpose of the invention to announce prayer timings satisfactorily. Translation of Cell-ID into Azaan-zones is a unique concept and is not present in any prior art.

**Expected Commercial Success :** Moreover, this application was published by U.S.P.T.O. on 23<sup>rd</sup> June 2005, and after that the applicant has had several discussions pertaining to the invention. Muslim communities have responded very enthusiastically and commercial organizations consider it a viable venture. Several cellular network providers are interested in incorporating the invention into their system as they expect to attract a lot of muslim subscribers to their services. All of this should convince any one that applicant's invention is indeed non-obvious.

#### **The Rejection of Claims 1-3, 9 and 11 On Rankin & Doulton Is Overcome**

The Office Action dated 20<sup>th</sup> May 2005, rejected independent claim 1 on **Rankin and Doulton**. Claim 1 has been re-written to define patentably over these references and any combination thereof. Applicant requests reconsideration of this rejection of claim 1, for the following reasons:

1. **Rankin** belongs to non-analogous art. Rankin teaches distributed system where computing is preferably performed at mobile device. The claimed invention advocates separation of algorithm from mobile device.
2. Differences between **Doulton** and the claimed invention, are beyond the capability of a person with ordinary skills in the art.
3. Even if **Rankin** and **Doulton** were to be combined in the manner proposed, the proposed combination will be very different from the claimed invention.
4. Industry has enthusiastically welcomed the claimed invention and thus it is expected to be a great **commercial success**, which will eventually prove the un-obviousness of the present invention.
5. The novel physical feature of claim 1 produce new and un-expected results and hence are unobvious and patentable over **Rankin and Doulton**.

After these general comments, above-mentioned points are further elaborated while individually discussing each referenced prior art:

**Rankin (6,879,838) :**

As the title "Distributed Location Based Service System" says, Rankin teaches a **distributed** system. It has been called "distributed" because a lot of computing/comparison and calculations are carried out within Rankin's Mobile Electronic Device 100. This is a very different scenario from claimed invention whereby Mobile hand-held device 20 does not perform any calculation whatsoever because all decisions are taken remotely by the web-based software application 40.

Rankin clearly elaborates this point in the Summary of the Invention :

"The present invention provides a distributed location based information service system which permits information in the form of a virtual map of location based resources related to a particular geographic location to be electronically transferred to a mobile electronic device, and to be interpreted locally by that device. The mobile device is equipped with a means of determining its location and is able to compare its current location to available location based resources independently of the network." (see col.1, lines 45-53)

Rankin's Mobile Electronic Device 100 is essentially required to have a Location Determination System 117, a Processor 112 and a Memory 113. (see Fig.2). Rankin's alternative embodiment depicted in Fig 6. also has these elements differently numbered as 105, 167, 162 and 163.

Rankin's Location Determination System is required so that "the current geographic location of a mobile device may be determined accurately within the mobile device by a process of both measurement and prediction, or interpolation, based on calculation." (see col.3, lines 56-60)

Claimed invention's Mobile Device 20 is the simplest possible of cellular devices. It only identifies itself to the network which determines its location through CELL-ID of the communication base station 25. Interestingly, even the Mobile Device 20 itself does not need to know its location. Location Server 30 keeps dynamic record of Mobile Device's identity and its corresponding CELL-ID which is accessible by the web-based software application 40 containing the algorithm to notify Mobile Device 20.

On the contrary, Rankin requires its Mobile Electronic Device 100 to download a virtual map of location based resources(see Fig 4, S2, L1) , and determine, interpolate its own location (see Fig 4, S4) and to perform complex comparisons between resource database and local map (see Fig 4, S5, S6, S7, S8, S9). Obviously this requires Rankin's Device 100 to be a computing power house.

Regarding the location determining techniques Rankin prefers a self-contained system like G.P.S. In Detailed description of invention, Rankin writes:

"One well-known method to provide the location determination function would be to use a GPS (Global Positioning System) receiver which is able to receive satellite signals to determine the location to within approximately +/-10 meters. GPS is an example of a self-contained location system. Another example of a self-contained location system is a system that receives signals from short range wireless beacons, e.g., radio, acoustic or infrared beacons, which emit an identifying location signal to mobile communications devices 100 within range."( see col. 4 Lines 17-27 )

Here again the difference between Rankin and the claimed invention is very clear. G.P.S. is a very expensive system while claimed invention uses CELL-ID which is a very inexpensive way of locating a mobile device. However Rankin's definition of location requires a higher degree of accuracy which can be provided by a system like G.P.S. On the other hand claimed invention's location can cover an area upto 25 miles across, and thus CELL-ID provides enough precision for the purposes of claimed invention.

**Doulton (4,512,667) :**

**Doulton's** solution is nothing but a **programmable calculator** coupled with a self-actuating **multiple alarm clock**.

**Doulton** combined the two devices to produce a compact, portable, stand-alone system.

The two original machines were quite common devices, even at the time of invention, as mentioned by Doulton "Such devices, based on micro-chip technology, are now commonplace and include calculators, alarm clocks, calendars, memo holders and so forth." (see col.1, lines 7-10)

Doulton produced a new device by **combining** calculation algorithm with the alarm clock. Quite contrarily, the claimed invention produces a new system by **separating** calculation algorithm from alarm/notification means.

Like Doulton, all other inventors of prior art thought it advisable to perform calculation within the portable device. Doulton and Hasebe are stand-alone systems and the calculation algorithm is inseparable from them. Rankin, Murray, and Ciechanowiecki produce solutions which work in tandem with the wireless telecommunication system but still they prefer to perform most of the calculation within their portable/mobile device. This is why they have some location determination/calculation unit (G.P.S.) within the mobile device, in addition to having processor and memory to perform complex calculation and comparisons. This local processing capability is advisable because it reduces un-necessary network traffic. Rankin's solution even downloads a virtual map of resources for local processing.

Thus it is a fact that once Doulton combined **algorithm** with **alarm** functions, nobody ever thought of separating the two. The claimed invention produces a **novel solution** by going back one step. In the present invention, **algorithm** is **stored remotely** at the web-server based software application 40, and the **alarm/notification is performed locally** at the mobile device 20. Noteworthy is the fact that network traffic will still be kept at minimum due to usage of Cell-ID as the location determining parameter. The Cell-Id is just a number and does not contribute to heavy network traffic like Rankin's virtual map of resources or Murray's event details and criteria parameters (see Murray – 6,484,033 -Fig 3. 132, 134, 137 & 129) .

Although Doulton does suggest "Entry of information identifying geographical location may be made automatically by providing the device with means for itself determining its location (see col.2, lines 27-29)", it would only means usage of a device like a G.P.S. receiver, or some other location determination unit. This suggestion can not be taken as a suggestion to combine with an elaborate "distributed location based service system" like Rankin's.

Even if Doulton and Rankin's solutions are to be combined, it will still produce a system in which mobile hand-held device performs most of the calculations. Separation of algorithm from the device is not suggested anywhere by Doulton. Even Rankin prefers the approach of performing all possible calculations within the mobile device, that is why Rankin calls the solution as "distributed". Above all, Doulton-Rankin combination will be using G.P.S. receiver, which is an expensive device and is not available in many cellphones. On the other hand, claimed invention uses Cell-ID as location determination parameter which is determined by cellular communication system.

The separation of algorithm from the mobile device produces un-expected results, because even the most primitive of cellular phones can qualify as the claimed invention's mobile device 20, because all it is required to do is to transmit its own identity, so that the cellular base station 25 can detect it.

A totally un-related and un-expected result of the claimed invention can be that it may re-use millions of cellular phones which have long been discarded as obsolete.

#### **Hasebe (2003/0103002 A1)**

Hasebe's primary purpose is to find an additional use for G.P.S. as mentioned, in Summary of the Invention, "It is an object of the invention to provide a portable terminal that provides additional functions, which are usable for the user and which can be used more frequently compared with simple GPS functions and digital camera functions." (see Page 1, line 007)

Hasebe's portable terminal include a position detector and/or an azimuth detector, and/or a mode selector and/or communicator for transmitting and receiving speech/control signals and/or a controller for (in)activating transmission and reception of control signals. (see Page 8, claims 1 – 8 )

Also see Fig 1. which shows C.P.U. 1, G.P.S. 12, Geometric Sensor 11, and Communicator 2, beside having ROM 4 & RAM 3.

Fig 2 shows additional Calculating Unit 13 & Timer 17.

Like Doulton, Hasebe is a stand-alone solution. Everything is done at the terminal.

Algorithm is inseparable from Hasebe's portable terminal, while on the other hand **the claimed invention's hand-held device is not required to contain any algorithm** or calculation unit or memory to store calculated results..

This shows that Hasebe's solution employs a totally different approach than the claimed invention.

Being a stand-alone solution, Hasebe uses portable terminal's local RAM 3, to store religious service timetables. Obviously these tables will have to be dynamically re-calculated / re-actuated, for the ever changing location of the portable terminal. All this requires a lot of computing power and storage capacity at the portable terminal. Moreover, this large storage capacity has to be replicated



for each instance of portable terminal. Contrarily, the claimed invention stores these tables remotely at the web-based software application 40. These tables are calculated once only for all possible locations. These tables are then used to decide the correct timings for sending Azaan/notifications to individual mobile device(s) 20.

Clearly, claimed invention's approach towards timetables storage is not only very different from Hasebe but actually has definite advantage over Hasebe.

Thus, it can be easily deduced that Hasebe's solution is based on a true combination of Rankin and Doulton. Hasebe uses G.P.S. receiver like Rankin and performs local calculation & storage like Doulton and as taught by Rankin in the "distributed" computing model.

Hence it is proved that the applicant's invention is distinctly different from **combination of Doulton, Rankin & Hasebe** because it teaches not only remote computing but also remote storage of reference table. Even location determination is done remotely by the cellular network system. While Doulton, Rankin and Hasebe rely on a location determination element like G.P.S. receiver which is situated locally within the portable device.

#### **Murray (6,484,033)**

Murray's definition of location is different than the concept of location in the claimed invention. This is because Murray deals with location based schedule management which include events like [meetings, appointments or luncheon. (col.1, lines 12-14)] and current location information is used along with current traffic data, [ to calculate the user's travel times and the distance to a particular point of interest. (col.2, lines 28-30) ]. This requires calculation of current positions accurate to a matter of meters. Which is possible through inclusion of Global Positioning System (GPS) receiver for determining the current location of Murray's "portable wireless communication device". Alternately, the current location can be computed by triangulation or by some other well known technique. This also requires the portable device to include processor and memory in order to perform complex calculations, and store the results.

Murray's claims 1 & 2, do not elaborate on "plurality of wireless communication devices (40, 42, 32, 47) However, claims 3, 4, 5, & 6 talk about device processor, device memory, and comparison of stored event information with current location..

Furthermore, Fig 1 includes GPS as 77, and traffic information as 46. Thus Murray's view of Wireless Communication system essentially includes Global Positioning System as its Location determination system.

Also Fig 2. elaborating wireless communication device 32 shows GPS Receiver 83, Device Processor 98, Device Memory 100, as well as the Device Event Management Application 108.

Murray's Fig 3. shows internal usage of Device Memory 100 which contains current information 111, like location 122, speed 124, direction 126, and traffic data 171 as well as an array of event details.

Interestingly, all this memory storage and complex computing processes are to be carried out locally **within the wireless communication device 32**. In this way Murray's device 32 is quite similar to Rankin's device 100 which also performs a lot of distributed computing. **And Both of these devices are totally different from claimed invention's mobile device 20 which does not perform any computing at all.**

Thus it is proved that Murray's system is inherently different from the claimed invention which requires a much simpler hand-held device only capable of transmitting its unique identity and being able to receive an electronic signal to activate the notification process.

**Piccioni (6,842,774) :**

Information flow in Piccioni is exactly opposite to that in the claimed invention.

Piccioni's mobile entity device 12 is a **super-server**, because it generates information for a server, (see col. 13, lines 51-52, col. 14, lines 61-63, col. 15, lines 14-15, col. 16, lines 35-36 ), while on the other hand, in the claimed invention, mobile device 20 is just a **dumb client**.

Piccioni's invention is exactly what it says in its title "**a situation tracking system**". A situation occurs when a event takes place. An event may be public safety issue, like a traffic accident, fire or chemical hazard, bomb scare, terrorist attack, excessive rains or floods or thunderstorm etc. **Piccioni's system is devised to track these sort of situations.**

Piccioni's FIG. 6 is a block diagram illustrating an information flow path between a law enforcement agency and others in accordance with the system ; and FIG. 7 is

a block diagram illustrating an information flow path between a investigator and others.

In both Fig. 6 & 7, a "public safety incident" originates the information flow, which is taken up by a **"mobile entity device" 12, "associated with a law enforcement vehicle"** (claim 1, 14, 16), (see col. 13, lines 51-52, col. 14, lines 61-63, col. 15, lines 14-15, col. 16, lines 35-36). This simply means that the police officer driving the vehicle uses mobile entity device 12 to send event details to a website and/or to a clearing house which filters this information to media, citizens and other law enforcement agencies, which are the ultimate recipients of the information. The purpose of clearing house is to distribute information selectively.

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Throughout Piccioni's claims and application text, wherever Mobile Entity Device 12 is mentioned, it is also said to be "associated with a law enforcement vehicle". Moreover Device 12 is always used to send information which means device 12 acts as a server, which sends information further to a web-server and/or to a clearing house.

While Piccioni's Mobile Entity Device 12 is the originator of the information, the claimed invention's mobile device 20 performs an exactly opposite function because it acts as the ultimate recipient of the information.

Piccioni's over all system is also very different from that of the claimed invention. Even if the information flow is reversed in Piccioni's system, it will still not be able to serve the purpose of the claimed invention. Possibly this is because of the basic difference between the definition of an event. Piccioni's events are accidents, while claimed invention's events are predictable and are results of algorithms. That is why the two systems are so different.

Thus it can be safely said that Piccioni's invention belongs to an un-related art.

**Ciechanowiecki 2003/0148776.:**

Ciechanowiecki is dis-qualified as prior art because it is primarily a direction indicator and thus it does not teach any thing regarding announcement/notification of Muslim prayer timings. In the whole Ciechanowiecki 's application text , just a single sentence is repeated three times.

1. Dependent claim 7 (see Page 2.) talks about cellular phone having " an alarm or messaging function to indicate ... the start and end of a prayer session. "  
However claim 7 is dependent on claim 1 which clearly states " a direction

request (from cellular phone) ... to a service provider and a network operator" (see Page 2., claim 1). Hence it is evident that Ciechanowiecki's solution does not provide for any automatic information system. Even the direction information is sent to the cellular phone in response to "a direction request (from cellular phone) ... to a service provider and a network operator" (see Page 2., claim 1)

2. The same sentence/phrase "an alarm or messaging function to indicate the start and end of a prayer session" is repeated in paragraph no.18, on Page 1, under "Disclosure of Invention".

3. Lastly, with a little variation, the same sentence/phrase is repeated in paragraph no. 36 on Page 2, as the last line of the application text: "Furthermore the system and/or phone could be used to sound an alarm or send a notification when prayers is to start and/or should finish"

That is all Ciechanowiecki says about prayer timings. It does not say anything about:

Where is the timing calculation algorithm stored ?

What is the location parameter used in calculation ?

Where are the look-up tables stored ? Who keeps the subscriber database?

Who makes the actual notification? Who decides the juristic method ?

How is the notification initiated ? automatic or as response to request ? Etc

One may even question the operability of Ciechanowiecki's system as the application does not disclose enough details about the system. Interestingly Fig 1. does show Ciechanowiecki's cellular phone 1 having display means 3 showing the words GPS as the mode 6. Fig. 2 shows the device 17 communicating with more than one base stations which gives an impression that either G.P.S. or some other location determination technique like triangulation is being used by Ciechanowiecki. Indeed, this requires mobile device 17 to have some computing or processing power as well as some memory to store the calculated results. This makes Ciechanowiecki device as an intelligent device. Here again this aspect is different from the claimed invention where mobile device 20 is a dumb device.

Hence, it is concluded that Ciechanowiecki should be disqualified as prior art as all it deals with is just a "Moslem Direction Indicator".

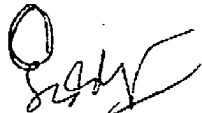
**Conclusion**

For all of the above reasons, applicant submits that the claims are now in proper form, and that the re-written claims all define patentably over the prior art. Therefore applicant submits that the application is now in condition for allowance, which action applicant respectfully solicits.

**Conditional Request for Constructive Assistance**

Applicant has amended the claims of this application so that they are proper, definite and define novel structure which is also unobvious. If, for any reason this application is not believed to be in full condition of allowance, applicant respectfully requests the constructive assistance and suggestions of the Examiner pursuant to M.P.E.P S 2173.02 and S 707.07(j) in order that the undersigned can place this application in allowable condition as soon as possible and without the need for further proceedings.

Very respectfully



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**Dated : 08-12-05**

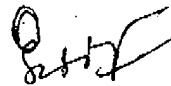
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2005 Aug 19



Qirfiraz Ahmed Siddiqui, Applicant

Attachment : Re-submission of Amendment "A" with Five re-numbered drawing sheets, now properly marked as "Replacement Sheet".